



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431**

July 17, 1997

Mr. Orlando Monaco
Naval Facilities Engineering Command
Environmental Contracts Branch
10 Industrial Highway
Lester, Pennsylvania 19115

Re: Naval Air Warfare Center (NAWC), Warminster, PA

Dear Mr. Monaco:

As discussed during our last BCT meeting, I have noticed that a recent "strategy memo" prepared by NAWC BTC/BEC Tom Ames has targeted Site 8 for transfer within the next nine (9) months. As you are aware, due to the reported disposal of hazardous substances, a CERCLA ROD for disposed wastes and/or associated soils is necessary to support a FOST for property containing Site 8.

Based on a review of the RI data base (including information contained in a Phase III Remedial Investigation Report (for Media Other Than Groundwater) dated November 1996), most of the data necessary to assess risk at Site 8 appears to be in place and suggests that "no action" under CERCLA may be necessary. However, there are two data gaps which need to be filled to provide for a complete assessment of risk. These two data gaps are discussed below.

1) Two surface soil samples collected within a small barren area immediately east of the runway (SS-08-10 and SS-08-11) contained low levels of dioxins. These were the only two surface soil samples were collected east of the runway. While the detected levels do not appear to indicate an unacceptable risk, the detected levels were high enough to warrant several additional surface soil samples in this area to confirm there are no higher dioxin levels of health concern and/or to delineate the areal extent of the subject levels. In addition, only one subsurface soil sample location has been sampled east of the runway. To help confirm that subsurface soils east of the runway do not present a threat, several additional locations should be sampled in this area. These samples should be collected at a depth of no greater than four feet and undergo full TCL/TAL analysis (analysis for dioxins/furans in these samples appears to be unnecessary.).

2) All subsurface soil samples collected at Site 8 to date (as part of the Phase III RI) were collected at a depth of 6 to 9 feet, while surface soil samples were collected at a depth of 2 inches to 2 feet. As a result, no samples have been collected to characterize soils from 2 to 6 feet in depth. To fill this data gap and support a final risk assessment for Site 8, soil in this interval should be characterized by sampling at a depth of 3 to 4 feet. Again, a full TAL/TCL analysis should be performed. Approximately six samples should be adequate in this case, with at least one location below the runway in the area of suspected pits identified in aerial photographs.

We recommend a brief RI workplan addendum be address these data gaps. Please give me a call should you have any questions or comments.

Sincerely,



Darius Ostrauskas

Remedial Project Manager

cc: Tom Ames, NAWC

David Kennedy, PADEP